

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

**In re:**

**Kevin R. Tortorella,**

**Debtor**

**Chapter 13**

**Case No. 17-11821-fjb**

**DEBTORS' MOTION TO EXTEND TIME TO FILE DOCUMENTS**

Now comes the Debtor herein and moves this Honorable Court, pursuant to MLBR 1007-1(g) and Fed.R.B.P 1007(c) [as they may be amended], to extend the time within which he must file certain documents as listed in the May 17, 2017 ORDER TO UPDATE (the Debtor's petition), and in support thereof it is represented that:

(a) the Debtors' petition was filed on May 16, 2017;

(b) the ORDER TO UPDATE issued on May 17, 2017 requires the Debtor to file various documents by 4:30 PM on May 31, 2017, including Ch. 13 Agreement Between Debtor and Counsel, Form 122C-1, Form 122C-2, and the Plan Certificate of Service, among other documents;

(c) cause exists for an extension due to the fact that while the Debtor has now provided all the information to complete the schedules and statements, the amount of information to sift through has been formidable [since there were three (3) prior corporations involved in the Debtor's recent financial history), and, since the filing of the petition counsel has been involved with urgent family matters that has taken him away from his office for the better part of the past two weeks, and more personal time is expected to be needed over the next week, thus, to properly complete the remaining documents required a brief extension is being requested herein;

(d) the Trustee's Meeting of Creditors is not scheduled until June 28, 2017 which allows more than sufficient time to supply all required documents prior thereto since the Debtor is only requesting until Friday, June 9, 2017 to file said documents;<sup>1</sup> and,

(e) the Debtor believes that no creditor or other interested party will be unduly prejudiced by the granting of this requested extension.

WHEREFORE, the Debtor prays that he be granted an extension to Friday, June 9, 2017 to file all the documents required by the ORDER TO UPDATE, and for such other and further relief that the Court deems just.

Respectfully submitted,  
Kevin R. Tortorella,  
By his attorney,

/s/ Stephen M. Kaplan  
Stephen M. Kaplan (BBO# 259220)  
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c:/tortorella/ch13/pleadings/mot to extend time to file docs

Date: May 31, 2017

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<sup>1</sup> With the exception of Evidence of Current and Sufficient Liability and Property Insurance, which is being filed contemporaneously herewith due to its special importance to verify for the trustee and the creditors.

**Ch. 13, Case No. 17-11821-fjb**

**CERTIFICATE OF SERVICE**

I, Stephen M. Kaplan, hereby certify that on May 31, 2017 I electronically filed with the Clerk of the Bankruptcy Court the attached:

**1. DEBTORS' MOTION TO EXTEND TIME TO FILE DOCUMENTS**

and, I served a copy of same upon the interested parties<sup>2</sup> in the following manner:

**Electronic Mail Notice List**

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- Carolyn Bankowski-13 13trustee@ch13boston.com
- Bertin C. Emmons bemmons@santander.us
- John Fitzgerald USTPRegion01.BO.ECF@USDOJ.GOV
- David B. Madoff madoff@mandkllp.com, alston@mandkllp.com

**Manual Notice List**

The following is the list of **parties** who are **not** on the list to receive email notice/service for this case (who therefore require manual noticing/service).

(No manual recipients)

/s/ Stephen M Kaplan  
Stephen M. Kaplan (BBO#259220)  
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<sup>2</sup> (having updated this list immediately prior to filing this pleading)